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Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

Kenneth Edward Ramirez,	)	Case No. 1:20-cv-00985-EPG
	)	
Plaintiff,	)	STIPULATION AND ORDER FOR
	)	EXTENSION OF TIME
vs.	)	(ECF No. 20)
	)	
Kilolo Kijakazi, Acting	)	
Commissioner of Social Security,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from September 15, 2021 to October 15, 2021, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time but first for this task. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. Counsel has due two Reply Briefs, two Motions for Summary Judgment, four

1 Opening Briefs, one Plaintiff's Memorandum, and one Plaintiff's Portion of Joint Submission  
2 due the same week.

3 Counsel has recently received a greater number of Answers and Certified Administrative  
4 Records from defendant in cases in this district, and the three other California Districts, each of  
5 which require settlement negotiations or merit briefing. Counsel has a greater than usual number  
6 of merit briefs due in September 2021. Thus, Counsel is requesting an extension into October  
7 2021 to accommodate the number of cases due in September 2021. Also, Counsel is in the process  
8 of increasing support staff to accommodate the increase in the number of cases at the briefing  
9 stage.

10 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant  
11 and Court for any inconvenience this may cause.

12  
13 Respectfully submitted,

14 Dated: September 8, 2021 PENA & BROMBERG, ATTORNEYS AT LAW

15  
16 By: /s/ Dolly M. Trompeter  
DOLLY M. TROMPETER  
17 Attorneys for Plaintiff  
18  
19

20 Dated: September 8, 2021 PHILLIP A. TALBERT  
21 Acting United States Attorney  
DEBORAH LEE STACHEL  
22 Regional Chief Counsel, Region IX  
23 Social Security Administration

24 By: \*/s/ Marcelo N. Illarmo  
25 Marcelo N. Illarmo  
26 Special Assistant United States Attorney  
27 Attorneys for Defendant  
28 (\*As authorized by email on September 8, 2021)

**ORDER**

Based on the above stipulation, IT IS ORDERED that Plaintiff shall serve Defendant with Plaintiff's Opening Brief no later than October 15, 2021. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: September 9, 2021

/s/ Eric P. Gray  
UNITED STATES MAGISTRATE JUDGE